



California Regional Water Quality Control Board

San Francisco Bay Region



Alan C. Lloyd, Ph.D.
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Arnold Schwarzenegger
Governor

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ALAMEDA POINT
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Mr. Thomas L. Macchiarella
Department of the Navy
Base Realignment and Closure Program Management Office West
1455 Frazee Road, Suite 900
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Subject: Comments on the Draft Operable Unit5/Annex IR-02 Groundwater proposed Plan, Alameda, California

Dear Mr. Macchiarella:

The San Francisco Bay Regional Water Quality Control Board (Water Board) staff reviewed the *Draft Operable Unit5/Annex IR-02 Groundwater Proposed Plan, Alameda, California*, dated October 31, 2005 (Draft PP) and has the following comments:

General Comments:

1. **Groundwater Beneficial Uses Designation:** The Draft PP stated in multiple locations that OU-5/Annex IR-02 groundwater does not have to comply with maximum contaminant levels because it is not likely to be use as a drinking water source. The reasons given include:
 - a. Water Board in 1999 concurred that the shallow groundwater at Alameda Annex meets the exemption criteria in the State Water Resources Control Board Resolution No. 88-63; and
 - b. Groundwater at the site is not currently used for drinking water, irrigation, or as an industrial supply; and
 - c. East Bay Municipal Utility District supplies the water in this area.

Staff disagrees with this conclusion. Although staff has concurred that the groundwater beneath Alameda Annex IR02 meets the Drinking Water beneficial use exemption criteria and that it is unlikely the shallow groundwater contaminated by the benzene plume would be used as a source of drinking water in the near future, staff has also determined that the groundwater beneath OU-5 is a potential drinking water source as defined in the Basin Plan. Furthermore, the basin is classified by the *East Bay Plain Groundwater Basin Beneficial Use Evaluation Report – Alameda and Contra Costa Counties, California*, (California Regional Water Quality Control Board, San Francisco Bay Region, June 1999) as a significant drinking water source due to the existence of a deep (500-1,000 feet) viable aquifer. Staff believes that in the absence of a thorough vertical conduit survey and an approved well abandonment program, the shallow aquifer

should be cleansed to Department of Health Services' maximum contaminant levels for drinking water to prevent contamination of the deep aquifer through vertical conduits.

Please contact me at (510) 622-2363 or email jchuang@waterboards.ca.gov if you have any questions.

Sincerely,



Judy C. Huang, P.E.
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